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April 17, 2006

**Via E-File And Hand Delivery**

The Honorable Kent A. Jordan  
United States District Court  
J. Caleb Boggs Federal Building  
844 N. King Street  
Wilmington, DE 19801

Re: *IT Litigation Trust v. Daniel A. D'Aniello, et al.*  
Civ. A. No. 04-01268 (KAJ)

Dear Judge Jordan:

I attach hereto as Exhibit 1 a copy of the parties' Stipulated Protective Order [Dkt. No. 155] ("Protective Order"), which was filed earlier today in the above-captioned matter.

The Protective Order is submitted to protect the confidentiality of certain materials recently requested by Plaintiff in discovery (and materials the parties may subsequently request from each other or from third parties in this case), and to avoid discovery disputes relating to such confidential materials. Certain of the documents requested by Plaintiff from Defendants are subject to protective orders in other actions and/or confidentiality agreements with third parties, and a discovery stay is in place pursuant to the Private Securities Litigation Reform Act in two class action cases involving the defendants in this Action. Accordingly, we respectfully submit that the Court's consideration and entry of the Protective Order is appropriate and in the best interests of all of the parties to this proceeding.

If Your Honor has any questions regarding the Protective Order or any other aspect of this matter, counsel remain available at the Court's convenience.

Respectfully submitted,



Marcos A. Ramos

Attachment

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cc: Roger D. Anderson, Esq. (via hand delivery)  
Ronald S. Gellert, Esq. (via hand delivery)  
Jeffrey M. Schlerf, Esq. (via hand delivery)  
Clerk of the Court (via hand delivery)  
Charles A. De Monaco, Esq. (via facsimile)  
Mark A. Willard, Esq. (via facsimile)  
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